

**Proposed Hearing Date: March 11, 2009 at 10:00 a.m. (prevailing Eastern Time)**  
**Proposed Objection Date: March 10, 2009 at 4:00 p.m. (prevailing Eastern Time)**

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Attorneys for Delphi Salaried Retirees Association  
and Other Non-Union Salaried Retirees of Debtors

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----x Chapter 11 Case No. 05-44481 (RDD)  
In re: : (Jointly Administered)  
: .  
DELPHI CORPORATION, et. al., : .  
: .  
Debtors. : .  
: .  
-----x

**NOTICE OF (A) RETIREES' EXPEDITED MOTION FOR STAY PENDING APPEAL,  
and (B) MOTION TO SHORTEN NOTICE WITH RESPECT TO RETIREES'  
EXPEDITED MOTION FOR STAY PENDING APPEAL**

PLEASE TAKE NOTICE that on March 6, 2009, the Delphi Salaried Retirees Association (“DSRA”) and other non-union salaried retirees of Debtors (collectively “Delphi Retirees”) filed: (a) Retirees’ Expedited Motion for Stay Pending Appeal (“Motion to Stay); and (b) Motion to Shorten Notice with Respect to Retirees’ Expedited Motion for Stay Pending Appeal (“Motion to Shorten Notice”).

PLEASE TAKE FURTHER NOTICE THAT if no written objections to the Motion to Stay or the Motion to Shorten Time are filed timely, served and received in accordance with requirements forth below, orders (substantially in the form enclosed herewith) will be submitted that will provide that the Motion to Stay and/or the Motion to Shorten Notice, as applicable, shall be granted in their entirety. If written objections are filed timely, served and received, a hearing to consider approval of the Motion to Stay or the Motion to Shorten Notice, as applicable, on a final basis will be held at **10:00 a.m. Eastern Time on March 11, 2009**, before the Honorable Robert D. Drain, the United States Bankruptcy Court, One Bowling Green, New York, NY 10004-1408 (the “Hearing”).

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motion to Stay and/or Motion to Shorten Notice must: (a) be in writing; (b) comply with the Bankruptcy Rules and the Local Rules; (c) set forth the name of the objector, nature and basis of any such objection and the specific grounds therefore; (d) be filed with the United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”) electronically in accordance with General order M-182 (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)) by registered users of the Bankruptcy Court’s case filing system and, by other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with a hard copy delivered directly to the chambers of Judge Drain) and served in accordance with General Order M-182; and (e) be further served so that they are RECEIVED no later than **March 10, 2009 at 4:00 p.m.** (prevailing Eastern Time) by: (i) the

Debtors at Delphi Corporation, 5725 Delphi Drive, Troy, Michigan 48098 (Attn: General Counsel), (ii) Deloitte & Touche LLP, Suite 900, 600 Renaissance Center, Detroit, Michigan 48024 (Attn: Brock E. Plumb), (iii) counsel to the Debtors, Skadden, Arps, Slate, Meagher & Flom LLP, 333 West Wacker Drive, Suite 2100, Chicago, Illinois 60606 (Attn: John Wm. Butler, Jr.), (iv) special counsel to the Debtors, Shearman & Sterling LLP, 599 Lexington Avenue, New York, New York 10022 (Attn: Douglas P. Bartner), (v) counsel to the agent under the Debtors' prepetition credit facility, Simpson Thacher & Bartlett LLP, 425 Lexington Avenue, New York, New York 10017 (Attn: Marissa Wesley), (vi) counsel to the agent under the Debtors' postpetition credit facility, Davis Polk & Wardwell, 450 Lexington Avenue, New York, New York 10017 (Attn: Marlane Melican), (vii) counsel to the official committee of unsecured creditors formed in these cases, Latham & Watkins LLP, 885 Third Avenue, Suite 1000, New York, NY 10022 (Attn: Robert J. Rosenberg), (viii) the Office of the Untied States Trustee for the Southern District of New York, 33 Whitehall Street, Suite 2100, New York, New York 10044 (Attn: Deirdre A. Martini, Esq.), and (ix) the indenture trustees for the Debtors' outstanding debt securities, Wilmington Trust company, 1100 North Market Street, Rodney Square North, Wilmington, Delaware 19890 (Attn: Corporate Trust Office) and Law Debenture Trust Company of New York, 780 Third Avenue, 31<sup>st</sup> Floor, New York, New York 10017 (Attn: Corporate Trust Office).

PLEASE TAKE FURTHER NOTICE that only those objections made as set forth herein, in accordance with the Case Management Orders (and the shortened notice and filing procedures reflected herein) will be considered by the Bankruptcy Court at the Hearing. If no objections to the Motion to Stay and/or Motion to Shorten Notice are timely filed and served in accordance with the procedures set forth herein and in the Case Management Orders, the Bankruptcy Court may enter an order granting the Motion to Stay and Motion to Shorten Notice without further notice.

Dated: San Francisco, California  
March 6, 2009

Attorneys for Delphi Salaried Retirees Association  
and Other Non-Union Salaried Retirees of Debtors

By: /s/ Neil A. Goteiner  
Neil A. Goteiner

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